

# ENFORCEMENT SENSITIVE

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WAD 2917  
FF# 8b  
No Date

To: Robert Farrell

From: David Croxton *DC*

This note is to update you on the Pier 91 tidal monitoring study and the pump test and to provide copies of BEI's plans for these tests. I approved the tidal monitoring study and BEI has already completed the study. I provided verbal comments to BEI on the pump test. BEI will submit a new pump test workplan in the near future and I requested that they send it directly to you. Please coordinate your comments with Carrie as she will cover for me while I am away.

Regarding the pump test, BEI made the changes we agreed to in our December meeting, however, they chose not to do any of the extra work we were pushing for. Even though we may have wanted the additional work, I feel it was their prerogative in this situation to decide if they were going to do it or not. My comments that I provided Burlington verbally are as follows:

1. Page 4 of the Pump test plan, section 2.1.1., 2nd paragraph, last line.

BEI needs to define what "sufficient duration" and "approximately stabilize" mean. We need to know what pumping rates and for how long they propose/anticipate to use in their step test. In their plans they state that they anticipate that the final constant discharge rate for the long pump test will be approx. 5 gal/minute (top of page 6). I discussed with BEI some type of scientific definition of "approximately stabilized" such as no more than 1/100th of a foot change in drawdown for 10 minutes of pumping.

2. Same as #1, 3rd paragraph, last two lines.

BEI needs to define "allowed to recover approximately to its ambient state" and "fully recovers." Again, we discussed a scientific parameter such as within 1/100th of a foot of its original level.

3. BEI needs to define what the goal of their step drawdown test is, e.g., the highest pumping rate that can be maintained without drawing the aquifer below the confining layer, or the highest level that can maintain a stabilized drawdown. This definition will drive their step test and how many steps they need instead of their statement on this page of "at least three stages or steps."

That's all I had Bob. Be on the look out for BEI's updated plan. Thanks.

cc: C. Sikorski

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